



BECK, CHAET & BAMBERGER, S.C.

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March 2, 2005

VIA FACSIMILE ONLY
297-4113

Clerk for the Honorable Susan V. Kelley
U.S. Courthouse
517 East Wisconsin Avenue
Milwaukee, WI 53202

Re: *Robert Mullins v. Paul A. Karsten*
Case No. 04-26017-svk
Adv. Proc. No. 04-2275
Robert Mullins v. Lisa S. Blythe
Case No. 04-26018-svk
Adv. Proc. No. 04-2274

Dear Clerk:

I am writing with regards to the Defendants' joint letter to the court dated March 1, 2005, wherein they request another adjournment of the trial scheduled for March 7, 2005 at 1:30 p.m. I am enclosing a copy of that letter for your ease of reference in case it has not made it to your desk.

I would like to begin by expressing my complete frustration in prosecuting this adversary proceeding on behalf of my client due to the numerous delay tactics interposed by the Defendants. Time and time again the Defendants have taken obstructive tactics to prolong this matter. Most recently, Ms. Blythe failed to appear for her deposition scheduled for Tuesday, March 1, 2005 which had been rescheduled from the previous week pursuant to her request. I have been told that she underwent surgery shortly before that date and that was why she was unable to attend. Unfortunately, this places me in the exact same position that I was in late January, wherein I have been unable to depose Ms. Blythe, which is central to my client's case.

Nevertheless, in order to move forward, I suggest that the trial of this matter is adjourned for a short period of time, i.e. less than 30 days (subject to the court's calendar, of course). Additionally, I would ask that the court instruct Ms. Blythe to submit to a deposition at my office for a set date and time next week, perhaps even the afternoon of March 7, 2005, so that there are no more unnecessary



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delays. To the extent that the Defendants seek additional time to hire counsel, they have known for quite sometime now that they would be without counsel at this stage and had plenty of time to do so. I further request that the Defendants are barred from benefitting from their strategies by being allowed to conduct any further discovery. At this time, the only deposition pending and awaiting completion is Ms. Blythe's and once this issue is addressed, the trial should proceed in the ordinary course at a new date and time within thirty (30) days. Finally, as a disclaimer, my client reserves any and all rights he may have to pursue sanctions against the Defendants for their dilatory conduct as alleged herein.

I would be glad to arrange a conference call with all parties to discuss these issues. Thank you for your consideration of the same. By copy of this letter, both Mr. Karstan and Ms. Blythe are receiving copies of the same via U.S. Mail.

Very truly yours,

BECK, CHAET & BAMBERGER, S.C.

A handwritten signature in black ink, appearing to read 'J. Jelenchick' or 'J. Jelenchick', is written over a stylized, cursive signature.

Steven W. Jelenchick

SWJ:paf
Enclosure
cc: Robert Mullins (w/ encl.)
Paul A. Karstan (w/o encl.)
Lisa S. Blythe (w/o encl.)
File No. 04118